

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE CITIGROUP INC. BOND LITIGATION

Master File No. 08 Civ. 9522 (SHS)

ECF Case

**NOTICE OF BOND PLAINTIFFS' MOTION TO COMPEL PRODUCTION
OF DOCUMENTS WITHHELD BY THE CITIGROUP DEFENDANTS
BASED ON THE "BANK EXAMINATION" PRIVILEGE**

PLEASE TAKE NOTICE that upon the accompanying Bond Plaintiffs' Memorandum of Law In Support Of Their Motion To Compel Production Of Documents Withheld By The Citigroup Defendants Based On The "Bank Examination" Privilege, the accompanying Declaration of John C. Browne In Support Of Bond Plaintiffs' Motion To Compel Production Of Documents Withheld By The Citigroup Defendants Based On The "Bank Examination" Privilege and the exhibits thereto, and any additional materials subsequently submitted by Bond Plaintiffs, Bond Plaintiffs Louisiana Sheriffs' Pension and Relief Fund, Minneapolis Firefighters' Relief Association, City of Tallahassee Retirement System, Miami Beach Employees' Retirement Plan, Southeastern Pennsylvania Transit Authority, City of Philadelphia Board of Pensions and Retirement, and American European Insurance Company, and proposed class representatives Arkansas Teacher Retirement System, Phillip G. Ruffin, and James M. Brown hereby move this Court, in Courtroom 23A of the Daniel Patrick Moynihan Courthouse at 500 Pearl Street, New York, New York, at a date and time to be set by the Court, pursuant to Rule 37(a)(3)(B) of the Federal Rules of Civil Procedure, and any other applicable rule, for an Order compelling production of documents being withheld by the Citigroup Defendants on the purported basis of the bank examination privilege. Pursuant to Local Civil Rule 6.1(a), the Citigroup Defendants' opposition, if any, is due by May 20, 2011.

Dated: May 13, 2011

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

By: /s/ Steven B. Singer
Steven B. Singer
John C. Browne
John Rizio-Hamilton
1285 Avenue of the Americas
New York, New York 10019
Tel: (212) 554-1400
Fax: (212) 554-1444

*Attorneys for Bond Plaintiffs, and
Court-Appointed Bond Counsel*

David Kessler
Darren J. Check
John A. Kehoe
Matthew L. Mustokoff
Richard A. Russo, Jr.
**BARROWAY TOPAZ KESSLER
MELTZER & CHECK, LLP**
280 King of Prussia Road
Radnor, PA 19087
Tel: (610) 667-7706
Fax: (610) 667-7056

*Additional Counsel for City of Tallahassee
Retirement System, Miami Beach
Employees' Retirement Plan, Southeastern
Pennsylvania Transit Authority and City of
Philadelphia Board of Pensions and
Retirement, and James M. Brown*

Marc I. Gross
Joshua B. Silverman
POMERANTZ HAUDEK BLOCK
GROSSMAN & GROSS LLP
100 Park Avenue
New York, NY 10017
Tel- 212-661-1100
Fax-212-661-8665

*Additional Counsel for American European
Insurance Company*